State of North Carolina
Department of Environment,
Health and Natural Resources
Winston-Salem Regional Office

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary

DEHNR

DIVISION OF ENVIRONMENTAL
MANAGEMENT
GROUNDWATER SECTION

March 12, 1996

CERTIFIED MAIL NUMBER:P-536 317 030
RETURN RECEIPT REQUESTED

Reid Teague
Eden Oil Co., Inc.
124 Fieldcrest Rd.
Eden, N.C. 27288

Attn: Mr. Teague

SUBJECT: Underground Storage Tank (UST) Closure Assessment at Pennrose Exxon Facility #0-018466, 415 Turner Drive, Rockingham County, Incident Number Unassigned

Dear Mr. Teague:

The Groundwater Section of the Winston-Salem Regional Office is now reviewing the UST closure assessment for the subject location. In order to determine whether or not the closure was performed in accordance with State and Federal regulations, the Groundwater Section must be provided with the following information *30 days from receipt of this letter*:

- a USGS topographical quadrangle map OR County/City street map with the site location identified;
- unless the tank excavation extended to all areas of the dispenser locations, samples are needed under associated dispensers -- one sample beneath each coupling joint location (swing joint, flexible connector) and one additional sample for every ten feet of island;
- sample under all associated product lines with no less than one sample for lines 20 feet or shorter, and at least one sample for every 20 feet thereafter;
- the disposal manifest for the tank(s) OR the address of the person/company the tank(s) were transferred to, along with their letter of acceptance;
- the disposal manifest for sludge contents from all tanks;

- refer to the enclosed chart(s) for analyses that are required to be run and were not for the original closure report, please resample as needed;
- a description of the decontamination method(s) used during sample collection (ie. soap/alcohol/distilled water rinse on tools, disposable gloves, etc.);
- the depth of tank burial(s) - the depth should be measured from land surface to the top of tank(s); and,
- a base map (scale map) showing the orientation of the tanks, pumps, and product lines -- named roads, buildings, and underground utilities -- North arrow and identified sample locations.

Your cooperation is appreciated. Providing the requested information by the deadline specified in this letter will prevent a Notice of Violation being issued to you for the failure to provide an adequate closure report.

All soil sample analyses must be accompanied by a chain-of-custody and the sampling protocol. *Please note that all subsurface investigative work is now required to be supervised by a Licensed Geologist or Professional Engineer, with all reports signed and sealed by that professional.* Please refer to the file name, **Pennrose Exxon Facility #0-018466**, on the cover letter of your reply. This will help us speed up the review. If you have any questions, please contact me at the letterhead address and/or telephone number.

Sincerely,

Thomas Moore

Thomas Moore
Hydrogeological Technician

cc: Regional Office Files

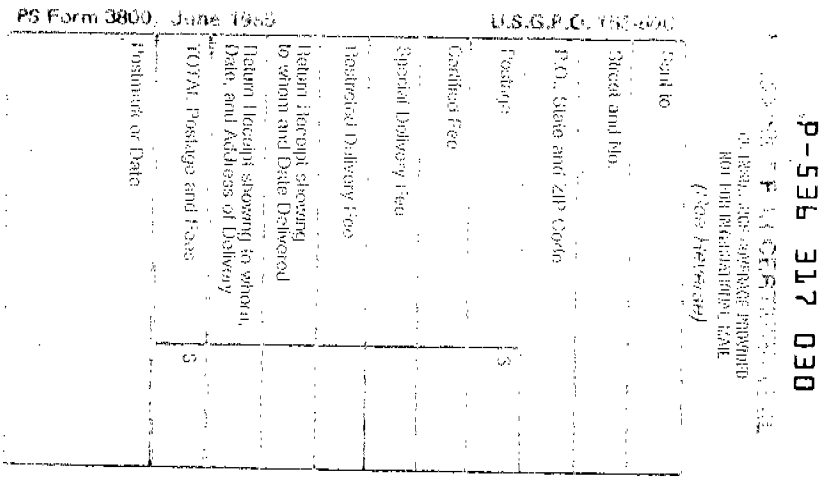

Table 5

Suggested Analytical Methods For Soil Analyses

Contaminant Testing For:	Method*	Reportable Concentrations
1) Low Boiling Point Fuels: Gasoline, Aviation Fuels, Gasohol, etc.	5030 Sample preparation with a Modified 8015 (California GC-FID Method) See page 34	10 ppm
2) High Boiling Point Fuels: Kerosene, Diesel, Varsol, Mineral Spirits, Naphtha, Fuel Oil #2, etc.	5030 and 3550 sample preparation with a Modified 8015(California GC-FID Method) See page 34	For 5030 10 ppm and For 3550 40 ppm
3) Heavy Fuels- #4, #5, #6 Fuel Oil, Motor Oil, Hydraulic Fluid, etc.	9071 - (Oil & Grease)	250 ppm
4) Used/Waste Oil	1. 9071 and 8021; if 9071 > 250 ppm or if compounds detected by 8021, then analyze using method #2 (1311) 2. 1311 (TCLP) Toxicity Characteristic Leaching Procedure - Total organics (volatile/semivolatile) and metals	MDL For 8021 MDL For 1311
5) Metals	TCLP (1311) for Metals	MDL For 1311
6) Halogenated Solvents	8021	MDL For 8021
Non-Halogenated Solvents	8240	MDL For 8240
7) Non-Petroleum - Unknown	1311 (TCLP) Toxicity Characteristic Leaching Procedure - Total organics (volatile/semi-volatile) and metals	MDL For 1311
8) Pesticides	Contact N.C. Department of Agriculture and regional Groundwater Section staff of the N.C. Department of Environment, Health, and Natural Resources	N/A
9) For Substances Not Covered in 1 - 7	Contact central Office Groundwater Section staff of the N.C. Department of Environment, Health, and Natural Resources.	N/A

MDL = Method Detective Limit

* Or other EPA Approved Comparable Method which also has similar costs and detection limits.